

Almodovar v. Guevara, et al.
Case No. 18 CV 2341

Negron v. Guevara, et al.
Case No. 18 CV 2701

EXHIBIT A

From: [Lindsay Hagy](#)
To: [Jennifer Bonjean](#)
Cc: [Josh M. Engquist](#); [Eileen E. Rosen](#); [Theresa B. Carney](#); [Ashley Cohen](#); [Haley Coolbaugh](#); [Russell Ainsworth](#); [Kara Hutson](#); [Megan McGrath](#); [Samantha J. Pallini](#); [Joseph M. Polick](#); [Katelyn Salek](#); [Jim Sotos](#)
Subject: Re: Almodovar/Negron - Deposition of Jackie Grande
Date: Wednesday, August 25, 2021 11:44:14 PM

Counsel,

Yes, we are taking the same position as Ms. Bonjean. Our client will not be attending Ms. Grande's deposition, but we support Mr. Almodovar's right to do so.

Best,

Lindsay

On Wed, Aug 25, 2021 at 3:37 PM Jennifer Bonjean <jennifer@bonjeanlaw.com> wrote:

I'm not available on the 15th any longer. You are the ones that want to take the time to file a frivolous and offensive motion to preclude my **WRONGLY CONVICTED** client from the deposition of a key witness who ironically almost killed my client (albeit via misconduct of the defendants) and not the other way around. The deposition is NOT going forward because it requires significant travel (that is three days) and I cannot leave three days open in my schedule while we litigate this nonsense. In fact I already have schedule things. . It was already a stretch for me because I have a hearing at 26th street on the 17th. You aren't calling the shots so settle down with your demands.

Jennifer Bonjean, Esq.

Bonjean Law Group, PLLC
750 Lexington Avenue, 9th Floor
New York, New York 10022

Tel: [718.875.1850](tel:718.875.1850)

Fax: [718.230.0582](tel:718.230.0582)

Email: Jennifer@bonjeanlaw.com

On Aug 25, 2021, at 3:15 PM, Josh M. Engquist <jengquist@jsotoslaw.com> wrote:

Counsel:

As the deposition is still 21 days away, we still intend to proceed on the 15th and complete this deposition.

Ms. Hagy and Mr. Ainsworth: You have been silent so far on this matter. Can

I assume you are taking the same position as Ms. Bonjean?

Sincerely,

Josh Engquist

(630) 735-3303

From: Jennifer Bonjean <jennifer@bonjeanlaw.com>
Sent: Wednesday, August 25, 2021 10:19 AM
To: Josh M. Engquist <JEngquist@jsotoslaw.com>
Cc: Eileen E. Rosen <erosen@rfclaw.com>; Theresa B. Carney <tcarney@rfclaw.com>; Ashley Cohen <ashley@bonjeanlaw.com>; Haley Coolbaugh <Haley@bonjeanlaw.com>; Lindsay Hagy <lindsay@loevy.com>; Russell Ainsworth <russell@loevy.com>; Kara Hutson <khutson@rfclaw.com>; Megan McGrath <mkm@ilesq.com>; Samantha J. Pallini <spallini@jsotoslaw.com>; Joseph M. Polick <JPolick@jsotoslaw.com>; Katelyn Salek <ksalek@jsotoslaw.com>
Subject: Re: Almodovar/Negron - Deposition of Jackie Grande

Go ahead and make your motion. Our position has not changed either. But the 15th is not going to work now. I can't save that date while we litigate this frivolous motion.

Jennifer Bonjean, Esq.

Bonjean Law Group, PLLC

750 Lexington Avenue, 9th Floor

New York, New York 10022

Tel: [718.875.1850](tel:718.875.1850)

Fax: [718.230.0582](tel:718.230.0582)

Email: Jennifer@bonjeanlaw.com

On Aug 25, 2021, at 9:52 AM, Josh M. Engquist
<jengquist@jsotoslaw.com> wrote:

Counsel:

The witness is still available on the 15th and her position on attendees has not changed. We will be filing a motion for a protective order shortly and I believe it can be resolved prior to the deposition, so we should keep that date.

As for time, you may not recall, but we did agree long ago to an even split (3 ½ hours of the deposition time for Plaintiffs). We will not go back on our agreement.

Sincerely,

Josh Engquist

(630) 735-3303

From: Jennifer Bonjean <jennifer@bonjeanlaw.com>
Sent: Monday, August 23, 2021 3:12 PM
To: Josh M. Engquist <JEngquist@jsotoslaw.com>
Cc: Eileen E. Rosen <erosen@rfclaw.com>; Theresa B. Carney <tearney@rfclaw.com>; Ashley Cohen <ashley@bonjeanlaw.com>; Haley Coolbaugh <Haley@bonjeanlaw.com>; Lindsay Hagy <lindsay@loevy.com>; Russell Ainsworth <russell@loevy.com>; Kara Hutson <khutson@rfclaw.com>; Megan McGrath <mkm@ilesq.com>; Samantha J. Pallini <spallini@jsotoslaw.com>; Joseph M. Polick <JPolick@jsotoslaw.com>; Katelyn Salek <ksalek@jsotoslaw.com>
Subject: Re: Almodovar/Negron - Deposition of Jackie Grande

I have no recollection of this so-called conversation. Also, before

this deposition, we need an agreement to split the 7 hours. If you can't agree to that we will have to raise with the court. I have already crossed this witness at a PC hearing, and know that I am going to need some time with her. This is particularly important since she is outside the jurisdiction of the court and will likely be unavailable for trial. We aren't having a repeat of that dumpster fire of a deposition I witnessed with Dorsch last week where your firm just eats up your time with ridiculous irrelevant questioning. Just curious, whose job is it in your firm to stalk my and my client's social media? Why doesn't one of you at least friend request me? If you have some objection to splitting time, we will need to get the court involved and that means the 15th is unlikely to happen anyway. So please advise asap.

From: "Josh M. Engquist" <JEngquist@jsotoslaw.com>
Date: Monday, August 23, 2021 at 4:04 PM
To: Jennifer Bonjean <jennifer@bonjeanlaw.com>
Cc: "Eileen E. Rosen" <erosen@rfclaw.com>, "Theresa B. Carney" <tcarney@rfclaw.com>, Ashley Cohen <ashley@bonjeanlaw.com>, Haley Coolbaugh <Haley@bonjeanlaw.com>, Lindsay Hagy <lindsay@loevy.com>, Russell Ainsworth <russell@loevy.com>, Kara Hutson <khutson@rfclaw.com>, Megan McGrath <mkm@ilesq.com>, "Samantha J. Pallini" <spallini@jsotoslaw.com>, "Joseph M. Polick" <JPolick@jsotoslaw.com>, Katelyn Salek <ksalek@jsotoslaw.com>
Subject: RE: Almodovar/Negron - Deposition of Jackie Grande

I do remember bringing this up long ago when we tried to do her deposition previously and there was no issue with the idea that no parties (plaintiffs or defendants) would be there in person.

Based on this email, I will have to reach out to the witness again.

Sincerely,

Josh Engquist

(630) 735-3303

From: Jennifer Bonjean <jennifer@bonjeanlaw.com>
Sent: Monday, August 23, 2021 2:59 PM
To: Josh M. Engquist <JEngquist@jsotoslaw.com>
Cc: Eileen E. Rosen <erosen@rfclaw.com>; Theresa B. Carney <tcarney@rfclaw.com>; Ashley Cohen <ashley@bonjeanlaw.com>; Haley Coolbaugh <Haley@bonjeanlaw.com>; Lindsay Hagy <lindsay@loevy.com>; Russell Ainsworth <russell@loevy.com>; Kara Hutson <khutson@rfclaw.com>; Megan McGrath <mkm@ilesq.com>; Samantha J. Pallini <spallini@jsotoslaw.com>; Joseph M. Polick <JPolick@jsotoslaw.com>; Katelyn Salek <ksalek@jsotoslaw.com>
Subject: Re: Almodovar/Negron - Deposition of Jackie Grande

Mr. Engquist.

We never had any conversation about this pre-covid or otherwise. Not only do I vehemently object to your attempt to bar the Plaintiffs from Ms. Grande's deposition, I can assure you that my client WILL be there. He has a right to be there. I'm sympathetic that Ms. Grande does not want to look the man in the eyes who was nearly murdered by the State as a result of her testimony, but that's her problem. Please let me know if the 15th is confirmed.

Jennifer Bonjean

From: Jennifer Bonjean <jennifer@bonjeanlaw.com>
Date: Monday, August 23, 2021 at 2:44 PM
To: "Josh M. Engquist" <jengquist@jsotoslaw.com>
Cc: "Eileen E. Rosen" <ERosen@rfclaw.com>, "Theresa B. Carney" <tcarney@rfclaw.com>, Ashley Cohen <ashley@bonjeanlaw.com>, Haley Coolbaugh <Haley@bonjeanlaw.com>, Lindsay Hagy <lindsay@loevy.com>, Russell Ainsworth <russell@loevy.com>, Kara Hutson <khutson@rfclaw.com>, Megan McGrath <mkm@ilesq.com>, "Samantha J. Pallini" <spallini@jsotoslaw.com>, "Joseph M. Polick" <JPolick@jsotoslaw.com>, Katelyn Salek <ksalek@jsotoslaw.com>
Subject: Re: Almodovar/Negron - Deposition of Jackie Grande

Josh,

I have no idea what you are referring to. What safety issues are you talking about? Please tell me that Ms. Grande isn't talking about safety issues as it relates to my client?! I need an answer to that question now before I confirm any deposition.

Bonjean Law Group, PLLC

750 Lexington Avenue, 9th Floor

New York, New York 10022

Tel: [718.875.1850](tel:718.875.1850)

Fax: [718.230.0582](tel:718.230.0582)

Email: Jennifer@bonjeanlaw.com

On Aug 23, 2021, at 1:19 PM, Josh M. Engquist
<jengquist@jsotoslaw.com> wrote:

We talked about this before ... she does not feel safe.

Sincerely,

Josh Engquist

(630) 735-3303

From: Jennifer Bonjean <jennifer@bonjeanlaw.com>
Sent: Monday, August 23, 2021 12:18 PM
To: Josh M. Engquist <JEngquist@jsotoslaw.com>

Cc: Eileen E. Rosen <erosen@rfclaw.com>; Theresa B. Carney <tcarney@rfclaw.com>; Ashley Cohen <ashley@bonjeanlaw.com>; Haley Coolbaugh <Haley@bonjeanlaw.com>; Lindsay Hagy <lindsay@loevy.com>; Russell Ainsworth <russell@loevy.com>; Kara Hutson <khutson@rfclaw.com>; Megan McGrath <mkm@ilesq.com>; Samantha J. Pallini <spallini@jsotoslaw.com>; Joseph M. Polick <JPolick@jsotoslaw.com>; Katelyn Salek <ksalek@jsotoslaw.com>

Subject: Re: Almodovar/Negron - Deposition of Jackie Grande

And why is that? Covid?

Jennifer Bonjean, Esq.

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New York, New York 10022

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Fax: [718.230.0582](tel:718.230.0582)

Email: Jennifer@bonjeanlaw.com

On Aug 23, 2021, at 1:03 PM, Josh M. Engquist <jengquist@jsotoslaw.com> wrote:

She does not want the plaintiffs there.

Sincerely,

Josh Engquist

(630) 735-3303

From: Jennifer Bonjean
<jennifer@bonjeanlaw.com>
Sent: Monday, August 23, 2021 12:01 PM
To: Josh M. Engquist
<JEngquist@jsotoslaw.com>; Eileen E.
Rosen <erosen@rfclaw.com>; Theresa B.
Carney <tcarney@rfclaw.com>
Cc: Ashley Cohen
<ashley@bonjeanlaw.com>; Haley
Coolbaugh <Haley@bonjeanlaw.com>;
Lindsay Hagy <lindsay@loevy.com>;
Russell Ainsworth <russell@loevy.com>;
Kara Hutson <khutson@rfclaw.com>;
Megan McGrath <mkm@ilesq.com>;
Samantha J. Pallini
<spallini@jsotoslaw.com>; Joseph M.
Polick <JPolick@jsotoslaw.com>;
Katelyn Salek <ksalek@jsotoslaw.com>
Subject: Re: Almodovar/Negron -
Deposition of Jackie Grande

What do you mean "no parties"?

From: "Josh M. Engquist"
<JEngquist@jsotoslaw.com>
Date: Monday, August 23, 2021 at 12:57
PM
To: Jennifer Bonjean
<jennifer@bonjeanlaw.com>, "Eileen E.
Rosen" <erosen@rfclaw.com>, "Theresa
B. Carney" <tcarney@rfclaw.com>
Cc: Ashley Cohen
<ashley@bonjeanlaw.com>, Haley
Coolbaugh <Haley@bonjeanlaw.com>,
Lindsay Hagy <lindsay@loevy.com>,
Russell Ainsworth <russell@loevy.com>,
Kara Hutson <khutson@rfclaw.com>,
Megan McGrath <mkm@ilesq.com>,
"Samantha J. Pallini"
<spallini@jsotoslaw.com>, "Joseph M.
Polick" <JPolick@jsotoslaw.com>,
Katelyn Salek <ksalek@jsotoslaw.com>
Subject: RE: Almodovar/Negron -
Deposition of Jackie Grande

Counsel:

The 15th works. The witness is willing, at this time, to do the deposition in person. As previously discussed (pre-covid), she requests that no parties be present during her deposition.

Please let me know if we can finalize this and lock in the date?

Sincerely,

Josh Engquist

(630) 735-3303

From: Jennifer Bonjean
<jennifer@bonjeanlaw.com>
Sent: Sunday, August 22, 2021 7:13 PM
To: Eileen E. Rosen
<erosen@rfclaw.com>; Theresa B. Carney
<tcarney@rfclaw.com>
Cc: Ashley Cohen
<ashley@bonjeanlaw.com>; Haley
Coolbaugh <Haley@bonjeanlaw.com>;
Lindsay Hagy <lindsay@loevy.com>;
Russell Ainsworth <russell@loevy.com>;
Josh M. Engquist
<JEngquist@jsotoslaw.com>; Kara
Hutson <khutson@rfclaw.com>; Megan
McGrath <mkm@ilesq.com>
Subject: Re: Almodovar/Negron -
Deposition of Jackie Grande

Also, I would need to know ASAP. I can't keep the date open for long

From: Jennifer Bonjean
<jennifer@bonjeanlaw.com>
Date: Sunday, August 22, 2021 at 6:05 PM
To: "Eileen E. Rosen"
<erosen@rfclaw.com>, "Theresa B. Carney" <tcarney@rfclaw.com>
Cc: Ashley Cohen
<ashley@bonjeanlaw.com>, Haley Coolbaugh <Haley@bonjeanlaw.com>, Lindsay Hagy <lindsay@loevy.com>, Russell Ainsworth <russell@loevy.com>, "Josh M. Engquist" <JEngquist@jsotoslaw.com>, Kara Hutson <khutson@rfclaw.com>, Megan McGrath <mkm@ilesq.com>
Subject: Re: Almodovar/Negron - Deposition of Jackie Grande

Eileen,

As for Jackie Grande's deposition, I can probably make it work on 9/15. Let me know if that works.

Jennifer Bonjean

From: "Eileen E. Rosen"
<erosen@rfclaw.com>
Date: Tuesday, August 10, 2021 at 9:53 AM
To: Jennifer Bonjean
<jennifer@bonjeanlaw.com>, "Theresa B. Carney" <tcarney@rfclaw.com>
Cc: Ashley Cohen
<ashley@bonjeanlaw.com>, Haley Coolbaugh <Haley@bonjeanlaw.com>, Lindsay Hagy <lindsay@loevy.com>, Russell Ainsworth <russell@loevy.com>, "Josh M. Engquist" <JEngquist@jsotoslaw.com>, Kara

Hutson <khutson@rfclaw.com>, Megan McGrath <mkm@ilesq.com>
Subject: RE: Almodovar/Negron - Deposition of Jackie Grande

Jennifer – can you please clarify.
Understanding that you intend to appear in person, can you do September 15 or 16, or are you saying that the whole week is out?

From: Jennifer Bonjean
<jennifer@bonjeanlaw.com>
Sent: Monday, August 9, 2021 3:37 PM
To: Theresa B. Carney
<tcarney@rfclaw.com>
Cc: Ashley Cohen
<ashley@bonjeanlaw.com>; Haley Coolbaugh <Haley@bonjeanlaw.com>;
Lindsay Hagy <lindsay@loevy.com>;
Russell Ainsworth <russell@loevy.com>;
Eileen E. Rosen <ERosen@rfclaw.com>;
Josh M. Engquist
<JEngquist@jsotoslaw.com>; Kara Hutson <khutson@rfclaw.com>; Megan McGrath <mkm@ilesq.com>
Subject: Re: Almodovar/Negron - Deposition of Jackie Grande

I insist on being there in person. So it has to work with my travel schedule.

Jennifer Bonjean, Esq.

Bonjean Law Group, PLLC

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New York, New York 10022

Tel: [718.875.1850](tel:718.875.1850)

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Email: Jennifer@bonjeanlaw.com

On Aug 9, 2021, at 4:34 PM,
Theresa B. Carney
<tcarney@rfclaw.com>
wrote:

We are determining travel
availability/options, but will
have a zoom option available.

From: Jennifer Bonjean
<jennifer@bonjeanlaw.com>
Sent: Monday, August 9,
2021 3:29 PM
To: Theresa B. Carney
<tcarney@rfclaw.com>
Cc: Ashley Cohen
<ashley@bonjeanlaw.com>;
Haley Coolbaugh
<Haley@bonjeanlaw.com>;
Lindsay Hagy
<lindsay@loevy.com>;
Russell Ainsworth
<russell@loevy.com>; Eileen
E. Rosen
<ERosen@rfclaw.com>; Josh
M. Engquist
<JEngquist@jsotoslaw.com>;
Kara Hutson
<khutson@rfclaw.com>;
Megan McGrath
<mkm@ilesq.com>
Subject: Re:
Almodovar/Negron -
Deposition of Jackie Grande

Are you envisioning this as a
zoom a deposition?

Jennifer Bonjean, Esq.

Bonjean Law Group, PLLC

750 Lexington Avenue, 9th
Floor

New York, New York 10022

Tel: [718.875.1850](tel:718.875.1850)

Fax: [718.230.0582](tel:718.230.0582)

Email: Jennifer@bonjeanlaw.com

On Aug 9, 2021,
at 4:09 PM,
Theresa B.
Carney
<tcarney@rfclaw.com>
wrote:

Jennifer:

Could you do
September 15 or
16?

Thank you,

Theresa

Theresa
Berousek Carney

**Rock Fusco &
Connelly, LLC**

321 N. Clark
Street, Suite 2200

Chicago, Illinois
60654

312.494.1000 (p)
I 312.494.1001
(f)

tcarney@rfclaw.com I <http://www.rfclaw.com>

[<image003.png>](#)

[<image004.png>](#)

From: Jennifer
Bonjean
<jennifer@bonjeanlaw.com>
Sent: Sunday,
August 8, 2021
10:52 AM
To: Theresa B.
Carney
<tcarney@rfclaw.com>;
Ashley Cohen
<ashley@bonjeanlaw.com>;
Haley Coolbaugh
<Haley@bonjeanlaw.com>;
Lindsay Hagy
<lindsay@loevy.com>;
Russell
Ainsworth
<russell@loevy.com>
Cc: Eileen E.
Rosen
<ERosen@rfclaw.com>;
Josh M. Engquist
<JEngquist@jsotoslaw.com>;
Kara Hutson
<khutson@rfclaw.com>;
Megan McGrath
<mkm@ilesq.com>
Subject: Re:
Almodovar/Negron

- Deposition of
Jackie Grande

Theresa,

We cannot make
that date work
because we are
scheduled to
commence a
hearing in the
matter of Sean
Tyler and
Reginald
Henderson before
Judge Flood on
that date. Please
let me know what
other dates you
propose with as
much advance
notice as possible
please.

Jennifer Bonjean

From: "Theresa
B. Carney"
<tcarney@rfclaw.com>
Date:
Wednesday,
August 4, 2021 at
5:29 PM
To: Jennifer
Bonjean
<jennifer@bonjeanlaw.com>,
Ashley Cohen
<ashley@bonjeanlaw.com>,
Haley Coolbaugh
<Haley@bonjeanlaw.com>,
Lindsay Hagy
<lindsay@loevy.com>,

Russell
Ainsworth
<russell@loevy.com>
Cc: "Eileen E.
Rosen"
<ERosen@rfclaw.com>,
"Josh M.
Engquist"
<JEngquist@jsotoslaw.com>,
Kara Hutson
<khutson@rfclaw.com>,
Megan McGrath
<mkm@ilesq.com>
Subject:
Almodovar/Negron
- Deposition of
Jackie Grande

Counsel:

Jackie Grande is
available for her
deposition on
Friday,
September 17.
Defendants are
available that day
as well. Please
let me know if
that date works
for your offices
so that we can
lock it in.

Thank you,

Theresa

Theresa
Berousek Carney

**Rock Fusco &
Connelly, LLC**

321 N. Clark
Street, Suite 2200

Chicago, Illinois
60654

312.494.1000 (p)
I 312.494.1001
(f)

tcarney@rfclaw.com I <http://www.rfclaw.com>

[<image005.png>](#)

[<image006.png>](#)

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Lindsay Hagy
Loevy & Loevy
311 N. Aberdeen St., Third Floor
Chicago, IL 60607
(312) 243-5900
Direct: (312) 357-5437